



August 17, 2017

Document Processing Desk 6(a)(2)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

**RE: 6(a)(2) Study Report Submission – Ethofumesate Technical (EPA Registration #264-611) – Environmental Fate Study Report**

Dear Sir/Madam,

Bayer is submitting new information to EPA related to Ethofumesate Technical (EPA Registration # 264-611) as required by conditions set forth in 159.179(a)(1). This information is not necessarily a new adverse effect of the subject chemical, but is rather new information submitted for EPA's own review and evaluation because the data meet EPA's administrative reporting criteria.

The Study Report and the findings are as follows:

1. [<sup>14</sup>C]Ethofumesate: Aerobic mineralization in surface water – MRID # 50350501. BCS-CW35117 (ethofumesate-acetic acid) was detected in a new study type which is required according to the 1107/2009 for active substance submission (AIR submission). The study (mineralization in surface water) is an aerobic aquatic metabolism study according to OECD 309. The test system is characterized by a very low microbial activity. A new metabolite was detected in this study – ethofumesate acetic acid – which in other soil and water/sediment systems with higher microbial activity was not detected or was detected only in minor amounts. It is considered to be a transient metabolite and a precursor of ethofumesate (NC8493).

This information is being submitted to the EPA pursuant to EPA's interpretation of requirements imposed on registrants by Section 6(a)(2) of FIFRA.

The content of this 6(a)(2) study report is also related to the Ethofumesate Technical Registration Review DCI (ID # GDCI-110601-1697). Therefore, please share it with Jordan Page, Chemical Review Manager.

Should EPA have questions, please feel free to contact me at any time.

Sincerely,

Sundee Williams  
AE Compliance Manager  
Crop Science  
A Division Of Bayer  
North American Knowledge & Information Management  
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M-597938-01-1

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DOCUMENTUM

CC:

Ann Hanger, CA Department of Pesticide Regulation

Jeanine Broughel, NY Department of Environmental Conservation

**TRANSMITTAL DOCUMENT****264-611 Ethofumesate Technical****CP-6(a)(2)-OPPTS-USA-D-016149****Transmittal Date**

August 17, 2017

Company Official:

A handwritten signature in cursive script that reads "Sundee K. Williams".

Company Name:

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M-597840-01-1

DOCUMENTUM

## **BIBLIOGRAPHY OF SUBMITTED DATA**

<b>Study No.</b>	<b>Study</b>	<b>Guideline No.</b>	<b>EPA MRID No.</b>
	RPT Study Reports		
	Series 835 Fate, Transport & Transformation Test Guidelines		
	Group D Transformation In Water & Soil Test Guidelines		
1	Fahrbach, M.; [14C]Ethofumesate: Aerobic mineralization in surface water; Harlan Laboratories Ltd., Itingen, Switzerland; Report No.: D25330; Document No.: M-439697-01-2; 2012-07-31; Pages: 142	835.4300	50350501



Receipt for Section 3

S: 1007824

Milestone Email: [sundee.williams@bayer.com](mailto:sundee.williams@bayer.com)

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Print Letter

Application Type: 6A2 Data

Fee For Service: ☐ Yes ☒ No

Enter More Information

Billable: ☐ Yes ☒ No

Tracking

Company: 264 BAYER CROPSCIENCE LP

V

Risk Manager: Registration Division, Risk Management Team 24

Product #: 264-611 Product Name: ETHOFUMESATE TECHNICAL

Override#:

Me Too  
Section3:

Me Too Product  
Name:

Application Date: 17-Aug-2017

OPP Rec'd Date: 17-Aug-2017

Front End Date: 22-Aug-2017

Risk Manager Send Date: 23-Aug-2017

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

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Receipt Content

Study

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

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